Sample. Kestrel Voice Networks, LLC is a fictional company; every name, number and answer here is invented to show what a real certificate and filing guide contain.

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2027 covering the prior calendar year 2026

1. Date filed: _____

2. Name of company(s) covered by this certification: Kestrel Voice Networks, LLC

3. Form 499 Filer ID: 000000

4. Name of signatory: Dana Whitfield

5. Title of signatory: President

6. Certification:

I, Dana Whitfield, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 CFR § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

_____

Dana Whitfield, President
[Signature of an officer, as agent of the carrier]

Attachments:

- Accompanying Statement explaining CPNI procedures

Accompanying Statement

Kestrel Voice Networks, LLC
Annual CPNI Certification for 2027, covering calendar year 2026
EB Docket No. 06-36

1. Company and scope

Kestrel Voice Networks, LLC (the "Company") provides interconnected VoIP service to business customers. This statement accompanies the Company's annual certification for 2027, covering calendar year 2026, and explains how the Company's operating procedures ensure that it is in compliance with the Commission's rules governing customer proprietary network information ("CPNI"), 47 CFR § 64.2001 et seq.

2. Use of CPNI

The Company uses CPNI to provide, bill and collect for the services its customers purchase, to provide customer service and technical support, and to protect against fraud and unlawful use of its services, which the rules permit without customer approval (47 CFR § 64.2005).

The Company does not use, disclose or permit access to CPNI for marketing. Because it does not use CPNI for any purpose that requires customer approval under 47 CFR § 64.2007, it does not solicit customer approval and conducts no outbound marketing campaigns that use CPNI. If that changes, the Company will put in place the notice, approval-tracking, campaign-record and supervisory-review procedures required by 47 CFR §§ 64.2008 and 64.2009(a), (c) and (d) before it begins any such marketing.

3. Disclosure to third parties

Vendors that perform services on the Company's behalf receive or access CPNI only as needed to perform those services.

The Company keeps a record of every instance in which CPNI is disclosed or provided to a third party, or a third party is allowed access to it, for at least one year (47 CFR § 64.2009(c)).

4. Training and discipline

Employees with access to CPNI are trained when they are hired and at least once a year on when they are and are not authorized to use or disclose CPNI (47 CFR § 64.2009(b)).

The Company maintains a written CPNI policy that employees are required to follow.

The Company has an express disciplinary process for employees who use or disclose CPNI in violation of its policy or the Commission's rules (47 CFR § 64.2009(b)).

5. Safeguards against unauthorized access

Access to CPNI is limited to employees who need it to perform their jobs.

The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including authenticating customers before discussing their accounts, limiting each employee's access to the customer information their role requires, and training staff to recognize and refuse pretexting attempts (47 CFR § 64.2010(a)).

On customer-initiated telephone calls, the Company discloses call detail information only after the customer provides a password that was not established using readily available biographical or account information. Otherwise it discloses call detail information only by sending it to the customer's address of record or by calling the telephone number of record (47 CFR § 64.2010(b)).

Customers' online access to CPNI is protected by a password, and customers are authenticated without the use of readily available biographical or account information (47 CFR § 64.2010(c), (e)).

The Company has no retail locations and does not disclose CPNI in person.

The Company notifies customers immediately whenever a password, back-up means of authentication, online account or address of record is created or changed, by voicemail or text to the telephone number of record or by mail to the address of record, without revealing the changed information (47 CFR § 64.2010(f)).

6. Breach response and recordkeeping

The Company maintains a written procedure for responding to a breach of CPNI, including notifying law enforcement and affected customers as required by 47 CFR § 64.2011.

The Company's CPNI records are maintained under the supervision of its Operations Manager.

7. Data brokers and customer complaints

The Company did not take any actions against data brokers during calendar year 2026.

The Company did not receive any customer complaints concerning the unauthorized release of CPNI during calendar year 2026.